1 2 3 4 The Honorable Ricardo S. Martinez 5 The Honorable David W. Christel 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 NYLYSHA STARVION BELAFON NO. 2:20-CV-01665-RSM-DWC ARADON, CAREY ALLEN HAYES, A.H., 10 a minor, A.L., a minor, STIPULATION AND ORDER TO 11 Plaintiffs, FILE DECLARATION OF SUSAN WALKER WITH ATTACHED 12 EXHIBITS UNDER SEAL SNOHOMISH COUNTY and its SNOHOMISH COUNTY SUPERIOR **NOTE ON MOTION** 13 COURT, and the SNOHOMISH COUNTY CALENDAR: January 20, 2022 **VOLUNTEER GUARDIAN AD LITEM** 14 PROGRAM; SUSAN WALKER and JOHN 15 DOE WALKER, individually and the marital community; KIRSTEN HAUGEN 16 and JOHN DOE HAUGEN, individually and the marital community; and, SARA DI VITTORIO and JOHN DOE DI 17 VITTORIO, individually and the martial 18 community, 19 Defendants. 20 I. **STIPULATION** 21 The parties, through counsel of record, agree as follows: 22 1. Defendant Susan Walker will be bringing a motion for summary judgment in 23 which she relies, in part, on documents which were filed in the underlying Snohomish County 24 Superior Court dependency matter as Exhibits A-K. Because the content of Ms. Walker's 25 declaration and the attached exhibits are related to the underlying dependency, the parties 26 STIPULATION AND ORDER TO FILE Freimund Tardif, PLLC 711 Capitol Way South, Suite 602 DECLARATION OF SUSAN WALKER WITH Olympia, WA 98501 ATTACHED EXHIBITS UNDER SEAL Telephone: (360) 534-9960 Fax: (360) 534-9959 NO. 2:20-CV-01665-RSM-DWC

stipulate that they should be filed with the Court under seal. Accordingly, the parties hereby jointly move the Court for an order permitting Ms. Walker's declaration with Exhibits A-K to be filed under seal.

- 2. The parties have conferred as required by LCR 5(g)(3)(A). The conference occurred telephonically and via e-mail with all parties' counsel on January 19, 2022. The parties agree that because the documents attached to Ms. Walker's declaration were filed in the underlying dependency and contain confidential information about the Plaintiffs, they need to be filed under seal in relation to Defendant Walker's motion. Redaction of the parents' names from the documents is insufficient to ensure confidentiality as they are already identified as the parties involved in the dependency in the Complaint.
- LCR 5.2(a) requires the redaction of "personal data identifies from all documents 3. filed with the court or use as exhibit." LCR 5.2(a)(2) specifically mandates reduction of personal identifiers such as the names of minor children. Washington law likewise limits the release of information obtained for use in child custody hearings. RCW 13.50.100. Consistent with these requirements, the documents filed in the underlying dependency matter should be filed under seal.

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IT IS SO STIPULATED.

DATED this 20th day of January, 2022.

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STIPULATION AND ORDER TO FILE DECLARATION OF SUSAN WALKER WITH ATTACHED EXHIBITS UNDER SEAL NO. 2:20-CV-01665-RSM-DWC

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9	INC. P.S.	
10	s/ Shannon M. Ragonesi	
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ATTACHED EXHIBITS UNDER SEAL NO. 2:20-CV-01665-RSM-DWC

Freimund Tardif, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98501 Telephone: (360) 534-9960 Fax: (360) 534-9959

1	ORDER	
2	The Court has reviewed the Stipulation of t	he parties. Now, therefore, IT IS HEREBY
3	ORDERED that the stipulation is APPROVED.	
4	It is further ORDERED that the Declaration of Susan Walker in Support of her Renewed	
5	Motion for Summary Judgment and Exhibits (Dkt. 94) are to remain SEALED.	
6	Dated this 15 th day of February, 2022.	
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8	3	
9		M. Muito
10	II .	David W. Christel
11	1 	United States Magistrate Judge
12		
13		opy received, approved as to form:
14	↓	UNDY LAW GROUP, PLLC
15	S TREINIOND TARDIT, TEEC	UNDI LAW GROUP, PLLC
16	<u>s/ Allison Croft</u> <u>s/ allison Croft</u>	Kristofer John Bundy
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26		4 Freimund Tardif, PLLC 711 Capital Way South Suite 602

DECLARATION OF SUSAN WALKER WITH

ATTACHED EXHIBITS UNDER SEAL NO. 2:20-CV-01665-RSM-DWC

1	Copy received, approved as to form:	Copy received, approved as to form:
		7.11
2	KEATING, BUCKLIN & MCCORMACK, INC. P.S.	LAW OFFICE OF MICHAEL WITHEY
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15	s/Patrick A. Trudell	
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20	megan@ktbllaw.com	
	Attorneys for Plaintiffs	
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26	STIPULATION AND ORDER TO FILE	5 Freimund Tardif, PLLC 711 Capitol Way South, Suite 602

|| STIPULATION AND ORDER TO FILE DECLARATION OF SUSAN WALKER WITH ATTACHED EXHIBITS UNDER SEAL NO. 2:20-CV-01665-RSM-DWC

1	CERTIFICATE OF SERVICE	
2 3	I hereby certify that on January 20, 2022, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:	
4	Michael E. Withey Kristofer John Bundy, WSBA # 19840	
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6	601 Union St., Ste 4200 Bellingham, WA 98227 Seattle WA 98101 <u>kris@bundylawgroup.com</u>	
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19	sdamianick@kbmlawyers.com	
20	lmartin@kbmlawyers.com Attorneys for Defendant Snohomish County	
21	DATED this <u>20th</u> day of January, 2022.	
22		
23	<u>s/Erika Summers</u> Paralegal	
24		
25		
26	STIPULATION AND ORDER TO FILE 6 Freimund Tardif, PLLC DECLARATION OF SUSAN WALKER WITH 711 Capitol Way South, Suite 602	

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DECLARATION OF SUSAN WALKER WITH
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